



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region Salem Office

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Salem, OR 97302

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TTY 711

February 25, 2026

Sarah Cook, City Manager
City of Jefferson
PO Box 83
Jefferson, OR 97352

Re: Warning Letter
Jefferson Sewage Treatment Plant
2026-WL-10129
NPDES Permit #101780, EPA ID OR0020451
File 43129, Site RID 21497
WQ-Marion County

Dear Ms. Cook,

DEQ has completed a records review for the City of Jefferson to determine compliance with the conditions of the National Pollutant Discharge Elimination System permit number 101780, issued on November 28, 2011. The findings are summarized below.

Permit Violations

DEQ has concluded that the city is responsible for violation of its permit as follows. Class I violations are the most serious violations; Class III are the least serious. Compliance with your permit is required by Oregon Revised Statute 468B.025(2).

Records Review

I reviewed records from November 2023 through December 2025. The city has submitted all monthly discharge monitoring reports (DMR) on time in NetDMR.

Schedule A Violations

Schedule A of the permit lists the waste discharge limitations. The city violated these limits as shown in Table 1 and 2 below. There were extenuating circumstances that led to permit violations as they occurred during an atmospheric river in the Willamette Valley and rainfall at the facility exceeded the 5-year 24-hour storm average precipitation amount, which was determined to be 3 inches. Jefferson measured rainfall at the treatment facility at 3.34 inches on December 18, 2025, and measured 2.481 MGD of influent flow on that same day. On December 19, 2025, influent flows were measured at 1.823 MGD but no rainfall was recorded. By the next time the city completed BOD₅ and TSS analysis, the influent flows and rainfall amount had returned to normal levels and were measured at 0.746 MGD and 0.16 inches of rain, respectively and effluent analysis was back within permit limits.

Table 1 – BOD Load Limit Violations

Exceeded monthly average, weekly average, and/or daily maximum limits of 100, 150, and 200 pounds per day during the time of Nov 1 – Apr 30, respectively, as follows:

Monitoring Period	Limit	Reported Value	Percentage Over Limit	Violation Class
Week of Dec 14-20, 2025	Weekly average, lb/d	171.2	14%	III

Violating BOD loading limits is a Class I violation if the discharge level exceeds the limit by 50% or more per OAR 340-012-0055(1)(k)(A); a Class II violation if the discharge level exceeds the limit by 20% or more but less than 50% per OAR 340-012-0055(2)(a)(A); and a Class III violation if the discharge level exceeds the limit by less than 20% per OAR 340-012-0055(3)(b)(A).

Table 2 - Total Suspended Solids Load Limit Violations

Exceeded monthly average, weekly average, and/or daily maximum limits of 100, 150, and 200 pounds per day during the time of Nov 1 – Apr 30, respectively, as follows:

Monitoring Period	Limit	Reported Value	Percentage Over Limit	Violation Class
Week of Dec 14-20, 2025	Weekly average, lb/d	395.3	164%	I
December 19, 2025	Daily maximum, lb/d	395.3	98%	I
December 2025	Monthly average, lb/d	127.7	28%	II

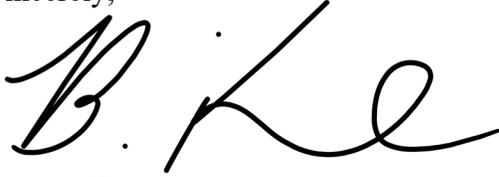
Violating TSS loading limits is a Class I violation if the discharge level exceeds the limit by 50% or more per OAR 340-012-0055(1)(k)(A); a Class II violation if the discharge level exceeds the limit by 20% or more but less than 50% per OAR 340-012-0055(2)(a)(A); and a Class III violation if the discharge level exceeds the limit by less than 20% per OAR 340-012-0055(3)(b)(A).

This notice is a warning letter. DEQ does not intend to take formal enforcement action at this time. However, should you repeat any of these violations, the matter may be referred to DEQ's Office of Compliance and Enforcement for formal enforcement action, including assessment of civil penalties and/or a DEQ order. Civil penalties can be assessed for each day of violation.

If you believe any of the facts in this pre-enforcement notice are in error, you may provide information to me at the office at the address shown at the top of this letter. DEQ will consider the new information you submit and take appropriate action.

If you have any questions, please contact me in writing at brenda.kuiken@deq.oregon.gov or by phone at (503) 893-0924.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Kuiken'. The signature is fluid and cursive, with a large initial 'B' and a long, sweeping tail for the 'e'.

Brenda Kuiken
WQ Compliance Specialist

cc: DEQ Salem Office file

ec: Ranei Nomura, Manager, Western Region DEQ
Oregon Records Management Solution
Jeff Buskirk, Public Works Director